THE SILBER LAW FIRM, LLC

11 BROADWAY · SUITE 715 NEW YORK, NEW YORK 10004

TELEPHONE: (212) 765-4567 FACSIMILE: (212) 504-8165

MEYER Y. SILBER
MSILBER@SILBERLAWNY.COM

Danielle 1. Pedras dpedras@silberlawny.com 342 BEDFORD AVENUE BROOKLYN, NEW YORK 11211 TELEPHONE: (718) 599-3500

February 28, 2017

Magistrate Judge Peggy Kuo United States District Court Eastern District of New York 225 Camden Plaza East Brooklyn, New York 11201

Re: Allstate Ins. Co. v. Mirvis; 08-CV-4405 (SLT)(PK)

Dear Judge Kuo:

This Firm represents non-parties Tatyana Mirvis, Alexander Boriskin and Lyubov Mirvis (the "Tatyana Non-Parties").

At document ECF No. 335, plaintiff Allstate Insurance Company filed a Motion to Avoid Fraudulent Conveyances By Judgment Debtor Mark Mirvis. With this motion, Allstate alleges that the home now owned by non-party Tatyana Mirvis should be turned over to Allstate as part of Allstate's collection efforts against Mark Mirvis.

I write to respectfully request oral argument on this motion. It is likely that under your Honor's Rules, I should have made this request when I filed (with the Court's permission) the Tatyana Non-Parties' supplemental opposition papers at ECF No. 466, and I apologize for that oversight. With the motion now fully submitted, I feel that it is important for the Court to hear from the parties in what will be shown to be an example of Allstate's overreach, especially in light of Allstate's misrepresentation of the facts and party statements.

Thank you.

Respectfully submitted,

ery. Silber

By ECF